



U.S. Department of Justice

United States Attorney  
Southern District of New York

**MEMO ENDORSED**

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

September 15, 2020

**By ECF**

The Honorable William H. Pauley III  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Shaquille Williams*, 20 CR 286 (WHP)**

Dear Judge Pauley,

The Government writes on behalf of the parties to request respectfully an adjournment of the conference currently scheduled for September 16, 2020 to October 19, 2020 at 9:00 AM, a date and time that the parties understands is convenient to the Court. The parties request the adjournment in order to permit the parties to receive and review the jury records previously sought by the defendant in this case in their entirety as well as other discovery in connection with this case and to afford the defendant additional time in which to consider any pre-trial motions in light of those materials. As the Court is aware, in *United States v. Balde*, 20 Cr. 281 (KPF), the Government has litigated a set of document requests that are substantially identical to those here and in response to which Judge Failla previously ordered the disclosure of certain jury records in possession of the Jury Administrator for the Southern District of New York, Linda Thomas. The preparation of those jury records in their entirety for provision in discovery both in *Balde* and here is still ongoing, though the parties are optimistic of those materials becoming fully available to the parties in short order. Finally, with the consent of the defendant, the Government requests respectfully that the Court exclude time under the Speedy Trial Act from September 16, 2020 through the date of any adjournment pursuant to 18 U.S.C. § 3161(h)(7) on the basis that the interest of the public and the defendant in a speedy trial are outweighed here by the interests of the defendant in having the opportunity to review discovery provided to date and that is anticipated to become available shortly and to consider any possible pre-trial motions, an exclusion that the

Government further submits is appropriate at this time in light of the national emergency declared over the coronavirus pandemic.

Respectfully,

AUDREY STRAUSS  
Acting United States Attorney

By: Thomas John Wright  
Thomas John Wright  
Assistant United States Attorney  
(212) 637-2295

cc: Glenn Garber (Counsel for Defendant Shaquille Williams) (by ECF)

Application granted. Conference adjourned to  
October 19, 2020 at 9:00 a.m. Time excluded in  
the interest of justice.  
SO ORDERED:

William H. Pauley III  
WILLIAM H. PAULEY III  
U.S.D.J.

September 15, 2020